

REMARKS

This is intended as a full and complete response to the Office Action dated November 5, 2004, having a shortened statutory period for response set to expire on February 5, 2005. Claims 18-48 remain pending in the application and are shown above with new claim 49. Claims 22-25, 27-34 and 39-48 stand rejected, claim 26 stands objected to and claims 18-21 and 33-38 indicated to be allowable by the Examiner. Please reconsider the claims pending in the application for reasons discussed below.

Specification

Applicants amended paragraph [0001] to update the parent application information as requested by the Examiner. Additionally, Applicants replaced the identification of WO00/37766 with the U.S. counterpart. For this reason, Applicants submit that incorporation by reference of U.S. Patent No. 6,457,532 is proper and does not constitute new matter. Therefore, Applicants respectfully request withdrawal of the objection to the specification.

Claim Objections

Applicants amended claim 24 to correct the informality as requested by the Examiner. Thus, Applicants respectfully request withdrawal of the objection to the claim.

Claim Rejections - 35 U.S.C. § 102

Claims 22-25, 31, 32 and 39-48 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Gano et al.* (U.S. Patent No. 6,568,472).

Regarding claim 22, *Gano et al.* discloses an expansion assembly that is disposed in a sand screen and has a washing port between a seal element and a

swedge. By its nature, the sand screen in *Gano et al.* cannot provide a substantially sealed fluid volume in an interior thereof. In fact, the purpose of the seal and wash port is to direct the flow of a washing fluid through the sand screen and into a surrounding annular space. In contrast, the substantially sealed fluid volume of the present invention enables use of hydraulic pressure in the substantially sealed fluid volume to provide an expansion force acting on the tubular. Therefore, *Gano et al.* fails to teach, show or suggest a seal axially spaced from an expander to provide a substantially sealed fluid volume in an interior section of an unexpanded portion of a tubular between the expander and the seal, as recited in claim 22 and claims 23-32 dependent thereon. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of the claims.

Regarding claim 39, a sand screen disclosed in *Gano et al.* does not have a substantially continuous circumference due to perforations formed in the sand screen. Thus, *Gano et al.* fails to teach, show or suggest an expander having an outer diameter portion larger than an inner diameter of a tubular to be expanded, wherein the tubular has a substantially continuous circumference, as recited in claim 39 and claims 40-43 and 49 dependent thereon. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of the claims.

Regarding claim 44, *Gano et al.* discloses flowing a washing fluid through a sand screen to a surrounding annular area prior to and during flowing of the washing fluid through grooves on a swedge that is expanding the sand screen. Flowing the washing fluid through the grooves achieves washing of the sand screen and a surrounding annular space along a length of swedge in contact with the sand screen. As a result, only a portion of the washing fluid actually flows along a length of the swedge within the grooves as taught in *Gano et al.* Therefore, *Gano et al.* fails to teach, show or suggest supplying a lubricant to an inside surface of a tubular by directing the lubricant against the inside surface of the tubular, wherein substantially all of the lubricant is forced between an expander and the inside surface of the tubular along a length of the expander in contact with the tubular, as recited in claim 44 and claims 45-48 dependent thereon. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of the claims.

Claim Rejections - 35 U.S.C. § 103

Claims 27-30 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Gano et al.* in view of *Metcalf et al.* (U.S. Patent No. 6,543,552).

In response, Applicants submit that the claims are patentable over the cited references based on the traversal presented above regarding claim 22 from which claims 27-30 depend. Specifically, *Gano et al.* in combination with *Metcalf et al.* fails to teach, show or suggest a seal axially spaced from an expander to provide a substantially sealed fluid volume in an interior section of an unexpanded portion of a tubular between the expander and the seal, as recited in claim 22 and claims 27-30 dependent thereon. Thus, Applicants respectfully request withdrawal of the rejection and allowance of the claims.

Double Patenting Rejection

Claims 18-21 stand rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 14-17 of U.S. Patent No. 6,712,151. In response, Applicants submit that the terminal disclaimer submitted herewith overcomes the double patenting rejection. Thus, Applicants respectfully request withdrawal of the rejection and allowance of the claims.

Allowable Subject Matter

Claims 18-21 and 33-38 stand allowed. Applicants acknowledge allowance of these claims.

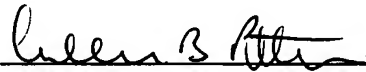
Claim 26 stands objected to as being dependent upon a rejected base claim. In response, Applicants submit that the claim is allowable based on the traversal presented above regarding claim 22 from which claim 26 depends. Thus, Applicants respectfully request withdrawal of the objection and allowance of the claim.

Conclusion

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, Applicants believe that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

The references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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